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| | | | |
| 11 | Attorneys for Plaintiffs | | |
| | | | |
| 12 | UNITED STATES DIS | TRICT COUF | łТ |
| 13 | | | |
| | DISTRICT OF NEVADA | | |
| 14 | LANGER COFFEE A WALL I I DANGELA | | • |
| | JAMES COFFEE, an Individual, and PAMELA | CASE NO.: | 2 |
| 15 | COFFEE, an Individual, | | |

CASE NO.: 2:20-CV-1352-APG-DJA

Plaintiffs,

WYNDHAM RESORT DEVELOPMENT CORP., WORLDMARK, THE CLUB, a California Corporation, and DOES 1 THROUGH 40, INCLUSIVE.

Defendants

STIPULATION AND ORDER TO EXTEND DEADLINE FOR PLAINTIFFS TO RESPOND TO **DEFENDANTS' MOTION TO DISMISS**

[FIRST REQUEST]

Plaintiffs, James Coffee and Pamela Coffee ("Plaintiffs"), by and through their counsel, Albright, Stoddard, Warnick & Albright, and Defendants, Wyndham Resort Development Corporation ("WRDC") and Worldmark, The Club ("Worldmark") (collectively hereinafter "Defendants"), by and through their counsel, Armstrong Teasdale LLP, hereby move pursuant to Fed. R. Civ. P. 6 and Local Rule LR IA 6-1, to extend the deadline for Plaintiffs to respond to the Defendants' Motion to Dismiss the Amended Complaint (ECF No. 23), filed on September 16,

Case 2:20-cv-01352-APG-DJA Document 31 Filed 10/01/20 Page 2 of 4

ALBRIGHT, STODDARD, WARNICK & ALBRIGHT

A PROFESSIONAL CORPORATION QUAIL PARK, SUITE D-4 BOI SOUTH RANCHO DRIVE LAS VEGAS, NEVADA B9106 2020, by two weeks to October 14, 2020, instead of the current deadline of September 30, 2020. This is the first request to extend this particular deadline.

Good cause exists to extend Plaintiffs' deadline to respond to the Defendants' Motion to Dismiss the Amended Complaint to October 14, 2020. Pursuant to Local Rule IA 6-1(b), the parties state the reason for the extension is that counsel requires more time to evaluate and respond to Defendants' above-mentioned Motion to Dismiss. Counsel for Plaintiff will also be unavailable for personal reasons during the first week of October, 2020. Counsel for Defendants agrees with the extension. This request is made in good faith and is not intended to unreasonably delay this matter.

DATED this <u>30th</u> day of September, 2020.

DATED this 30th day of September, 2020.

ARMSTRONG TEASDALE LLP

ALBRIGHT, STODDARD, WARNICK & ALBRIGHT

/s/ Jorge L. Alvarez, Esq.

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Attorneys for Plaintiffs

/s/ Michelle D. Alarie, Esq.

MICHELLE D. ALARIE, ESQ.

Nevada Bar No. 11894

3770 Howard Hughes Parkway, Suite 200

Las Vegas, Nevada 89169 Telephone: 702.678.5070 Facsimile: 702.878.9995

malarie@atllp.com

Attorneys for Defendants

ORDER

IT IS SO ORDERED, this 1st day of October, 2020.

UNITED STATES DISTRICT JUDGE

Andrea Brebbia

From: Jorge Alvarez

Sent: Wednesday, September 30, 2020 2:30 PM

To: Andrea Brebbia

Subject: FW: Coffee v. Wyndham [IWOV-IDOCS.FID3890328]

Follow Up Flag: Follow up Flag Status: Flagged

Please file. Thanks.

From: Michelle D. Alarie <MAlarie@atllp.com>
Sent: Wednesday, September 30, 2020 2:26 PM
To: Jorge Alvarez <jalvarez@albrightstoddard.com>

Subject: RE: Coffee v. Wyndham [IWOV-IDOCS.FID3890328]

Jorge,

You have my consent to affix my electronic signature for filing.

Thank you,



Armstrong Teasdale LLP Michelle D. Alarie | Associate

DIRECT: 702.415.2946 | FAX: 702.977.7483 | MAIN OFFICE: 702.678.5070

COVID-19 RESOURCE CENTER

*** Please note my new email address, malarie@atllp.com ***

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From: Jorge Alvarez [mailto:jalvarez@albrightstoddard.com]

Sent: Wednesday, September 30, 2020 12:22 PM

To: Michelle D. Alarie

Subject: FW: Coffee v. Wyndham



Hi Michelle,

Please ignore the previous SAO. Here is an updated version. Let me know if we may affix your e-signature.

Thanks,

Jorge L. Alvarez, Esq. Albright, Stoddard, Warnick & Albright 801 So. Rancho Dr., Suite D-4 Las Vegas, NV 89106 Phone (702) 384-7111 Fax (702)-384-0605 jalvarez@albrightstoddard.com

From: Andrea Brebbia <a hrebbia@albrightstoddard.com>

Sent: Wednesday, September 30, 2020 12:17 PM **To:** Jorge Alvarez <<u>jalvarez@albrightstoddard.com</u>>

Subject: Coffee v. Wyndham

Respectfully,

Andrea Brebbia, Paralegal Albright, Stoddard, Warnick & Albright 801 South Rancho Dr., Ste D-4 Las Vegas, Nevada 89106 Tel: (702) 384-7111

Fax: (702) 384-0605

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